

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	:	CHAPTER 9
IN RE	:	
	:	CASE NO. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	HON. STEVEN W. RHODES
DEBTOR	:	
-----X	:	

**STIPULATION TO ENTRY OF ORDER RESOLVING OMNIBUS CLAIMS
OBJECTION WITH RESPECT CLAIMS FILED BY MICHIGAN BUILDING AND
CONSTRUCTION TRADES COUNCIL**

Michigan Building and Construction Trades Council (“MBCTC”) and the City of Detroit, Michigan (the “City”), by and through their undersigned counsel, state as follows in support of the entry of the *Order Resolving Omnibus Claims Objection With Respect to Claims Filed by Michigan Building and Construction Trades Council* attached hereto as **Exhibit 1**.

1. On February 21, 2014, MBCTC filed an unliquidated proof of claim on behalf of certain individuals employed by the Detroit Water and Sewerage Department related to collective bargaining obligations [Claim No. 2588].

2. On February 21, 2014, MBCTC also filed an unliquidated proof of claim on behalf of certain individuals not employed by the Detroit Water and Sewerage Department related to collective bargaining obligations [Claim No. 2585].

3. On May 14, 2014, the City filed its *First Omnibus Objection to Certain Claims* [Doc. No. 4792] (the “Claims Objection”) wherein it objected to Claim No. 2588 on the basis that it was duplicative of Claim No. 2585.

4. Upon discussion by the Parties, the City has determined that Claim Nos. 2585 and 2588 are not duplicative of one another and will withdraw its objection to Claim No. 2588 as a duplicate claim of 2585.

5. The City reserves all of its rights to object to Claim Nos. 2585 and 2588 on any grounds and MBCTC reserves all of its rights to respond to any such objections.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** resolving the Claim Objection with respect to MBCTC's claims.

Respectfully submitted by:

FOLEY & LARDNER, LLP By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P 73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com <i>Counsel to the Debtor, City of Detroit</i> <i>Michigan</i> Dated: June 24, 2014	MCKNIGHT, MCCLOW, CANZANO, SMITH & RADTKE, P.C. By: <u>/s/ John R. Canzano (w/consent)</u> John R. Canzano (P30417) 400 Galleria Officecentre, Ste. 117 Southfield, MI 48034 Phone: (248) 354-9650 jcanzano@michworklaw.com <i>Counsel to Michigan Buildings and</i> <i>Construction Trades Council</i>
--	--